2024 May-30 PM 12:31 U.S. DISTRICT COURT

N.D. OF ALABAMA

EXHIBIT 15

SWORN STATEMENT OF BRANDI RUSSELL

- 1. My name is Brandi Russell. I am over the age of 21 and have personal knowledge of the contents of this statement.
- 2. I started working for CRC around 2002 in the accounting department. After maybe a couple years, I moved to an account executive position on Rusty Hughes' team and have been on his team ever since.
- 3. When Hughes came to me about becoming an inside broker on the team, I was the account executive managing Hughes' entire book of business. Hughes' book contained approximately 400-500 accounts plus another 10-20 new accounts per month.
- 4. Around the time I was promoted, Hughes and Tyler O'Connor were restructuring the team. As part of this restructuring, one of the account executives on our team, Amber Finch, started helping me more on Hughes' accounts. Before then, Finch had been helping everyone on the team.
- 5. As an inside broker, I am clearing new business from Hughes' book completely on my own and working to grow the team's revenue from Hughes existing agents. I am still responsible for processing Hughes' accounts by issuing quotes and binders which Finch may help with, but I have the most contact with the agent. Finch will do filings for me, input information, ask for loss runs, send policies offshore for processing, and send out renewal submissions.
 - 6. I received an increase in my salary when I was promoted.
- 7. I do not and have not wanted to become a broker with my own book of business. I do not want to travel. Hughes has invited me to travel with him to visit agents, but I have always said no. The brokers on our team, O'Connor and Hughes, travel a lot and are required to bring in business. I am not required to develop my own book of business as an inside broker.

	8.	When O'Connor joined our team, he was traveling some and that has increased over
time.	When he	e first started on the team, I recall him traveling to get new business and handling
those	accounts	on his own start to finish.

I declare under penalty of perjury that the foregoing is true and correct.

		Brandi Russell
Date:	5/29/24	BRANDI RUSSELL